

San Francisco Bay Regional Water Quality Control Board

TENTATIVE ORDER

**AMENDMENT OF
CEASE AND DESIST ORDER
for
CITY OF PACIFICA
CALERA CREEK WATER RECYCLING PLANT AND
COLLECTION SYSTEM
in
PACIFICA, SAN MATEO COUNTY**

WHEREAS the California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter “Regional Water Board”), finds the following:

1. The Regional Water Board issued to the City of Pacifica (hereinafter “Discharger”) Cease and Desist Order No. R2-2011-0031, on May 11, 2011. Order No. 2011-0031 enforced the requirements of the Regional Water Board’s Order No. R2-2006-0067 (which is an NPDES permit), and the State Water Resources Control Board’s Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (Sanitary Sewer Order), as amended. The Regional Water Board reissued the Discharger’s NPDES permit in 2012, rescinding Order No. R2-2006-0067. However, the requirements that were enforced by Cease and Desist Order No. 2011-0031 remained in force, and are nearly identical to corresponding requirements in the reissued 2012 NPDES permit (Order No. R2-2012-0002).
2. Cease and Desist Order No. R2-2011-0031 requires the Discharger to take specific actions to reduce and ultimately eliminate sanitary sewer overflows. These actions include improving operation and maintenance of its collection system, and developing and implementing capital improvement plans. The Regional Water Board adopted Order No. R2-2011-0031 as part of a settlement package that included \$1.7 million in liabilities for past discharges of untreated and partially treated wastewater to the Pacific Ocean and tributary streams.
3. The Discharger owns and operates the Calera Creek Water Recycling Plant and collection system. The Plant and collection system serves a population of approximately 39,000 in Pacifica. The Discharger’s collection system consists of 82 miles of gravity sewers, 3.8 miles of force mains (0.4 miles are no longer in service), and five sewage pump stations with a total pumping capacity of 34,000 gallons per minute. The force mains comprise of five separate force mains: Skyridge (1,500 feet), Brighton (840 feet), Rockaway (330 feet), Sharp Park (7,766 feet), and Linda Mar (9,655 feet).

4. This Order amends Cease and Desist Order No. R2-2011-0031 to require use of condition assessment technologies that are more appropriate for Sharp Park and Linda Mar force mains (see Figure 1, attached). This Order also allows additional time to complete these new assessments. Order No. R2-2011-0031 Provision I.7 had required, in part, that by March 1, 2013, the Discharger complete condition assessment of 100 percent of its collection system, including forced mains, using closed circuit television (CCTV) inspection. In response, the Discharger will have completed by February 28, 2013, CCTV inspection of 100 percent of its gravity lines, and three of its five force mains (total of 2,670 feet, or 13 percent).
5. Sometime in early 2012, the Discharger became aware of the need for condition assessment methodologies that may be more informative for different types of force mains due to limitations of CCTV inspections of those types of force mains. The Discharger requested, and obtained a February 8, 2012, report from Brown and Caldwell, an engineering consulting firm with expertise in this field. The report outlined the limitations of CCTV inspections, and strategies for alternate condition assessment methodologies for two of Discharger's force mains. The utility of these strategies were verified during a July 12, 2012, workshop on force main condition assessment held by the Bay Area Clean Water Agencies. In general, the strategies consist of identifying high risk sections of a force main for excavation and physical structural analysis. High risk areas include sections where air pockets have form that would lead to internal pipe corrosion, and where the main is shallower and subject to more road load stresses. Acoustic and electromagnetic testing are new technologies that can also help identify high risk areas for further examination.
6. On December 3, 2012, the Discharger outlined a proposal to Regional Water Board staff for the use of alternative condition assessment methodologies for its Sharp Park and Linda Mar force mains. The Sharp Park force main is a 26-inch high density polyethylene (HDPE) force main. Because HDPE is black and highly reflective, a CCTV inspection will provide limited information about pipe condition. The Discharger proposes to identify key locations based on depth of force main burial followed by excavation and examination for roundness or deformation and possibly removal of pipe sections for laboratory structural analysis. The Linda Mar force main is a 20-inch steel reinforced concrete pipe. The limitation of CCTV of reinforced concrete is the inability to see damage from corrosion from the outside. The assessment strategy would include (1) soil corrosivity testing and other soil condition evaluations to identify areas more prone to corrosion, and (2) pipe elevation analysis to identify internal sections likely to have air pockets with possible acoustic testing to check for air pockets and leaks. This would be followed by excavation and physical examination of pipe samples for corrosion and overall integrity.
7. This Order is an amendment of an enforcement action and, as such, is exempt, as is the underlying enforcement action is exempt, from the provisions of California Environmental Quality Act (Pub. Res. Code § 21000 *et seq.*) in accordance with Title 14, California Code of Regulations section 15321.

8. The Regional Water Board notified the Discharger and interested agencies and persons of its intent to consider adoption of this Order, and provided an opportunity to submit written comments.
9. In a public meeting, the Regional Water Board heard and considered all comments pertaining to this Order.

IT IS HEREBY ORDERED, pursuant to the provisions of California Water Code division 7, and regulations adopted thereunder, that the Discharger shall comply with Cease and Desist Order No. R2-2011-0031, as amended by this Order as described below.

1. Order No. R2-2011-0031, Provision I.7, is amended as follows (additions are shown in underline, and deletions in ~~strike through~~ text):

7. **Condition Assessment.** By March 1, 2012, the Discharger shall complete a condition assessment of 100% of its collection system including force mains, except for the Linda Mar and Sharp Park force mains. The condition assessment shall be based on closed circuit television (CCTV) inspection and employ a system for ranking the condition of sewer pipes that meets National Association of Sewer Service Companies (NASCO), or other industry-accepted standards.

By July 1, 2013, the Discharger shall begin field work on condition assessment of its Linda Mar and Sharp Park force mains using assessment methodologies outlined in the attachment to its submittal to the Regional Water Board dated December 3, 2012. By January 1, 2014, The Discharger shall complete the condition assessment. The Discharger shall rank the condition of these force mains.

The Discharger shall use the results of the CCTV inspection and other condition assessment to identify and prioritize collection system deficiencies requiring repair, rehabilitation, or replacement, and shall incorporate identified sewer repair, rehabilitation, and replacement projects into the Capital Improvement Plan, or CIP (defined below), based on the ranking and resulting prioritization. The Discharger shall develop and implement a schedule for reinspection of all gravity and forces main sewer lines based on the condition of such lines.

2. This Order shall become effective immediately upon adoption.

I, Bruce Wolfe, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on [DATE].

Bruce H. Wolfe
Executive Officer

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Figure 1. City of Pacifica, Sharp Park and Linda Mar Force Mains

